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Attorney for Defendants Marc Baier, Ryan Adams, & Daniel Gericke

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

LOUJAIN HATHLOUL ALHATHLOUL,

Plaintiff,

vs.

**DARKMATTER GROUP, MARC BAIER,
RYAN ADAMS, AND DANIEL
GERICKE,**

Defendants.

Case No. 3:21-cv-01787-IM

**JOINT UNOPPOSED MOTION FOR
EXTENSION OF TIME FOR
DEFENDANTS DARKMATTER GROUP,
MARC BAIER, RYAN ADAMS, AND
DANIEL GERICKE TO FILE REPLY IN
SUPPORT OF MOTION TO DISMISS**

LOCAL RULE 7-1 CERTIFICATION

Counsel for Defendant DarkMatter certifies that he conferred with Plaintiff's counsel and with counsel for Defendants Marc Baier, Ryan Adams, and Daniel Gericke. The Individual Defendants join this motion, and Plaintiff does not oppose.

MOTION

Defendants DarkMatter Group ("DarkMatter"), Marc Baier, Ryan Adams, and Daniel Gericke, ("Individual Defendants," and collectively, "Defendants") by and through their undersigned counsel, hereby submit this Joint Unopposed Motion for Extension of Time to file their Reply in Support of their Motion to Dismiss. Defendants seek an extension up to and including September 9, 2022 within which to file their Reply.

Defendants filed their Motion to Dismiss on May 31, 2022. (ECF 28.) Plaintiff filed her Opposition to the Motion to Dismiss on July 21, 2022, (ECF 35) after the Court granted two Unopposed Motions for Extension of Time (ECFs 31 and 33), which extended Plaintiff's deadline to respond to Defendants' Motion to Dismiss by a total of 37 days. The deadline for Defendants to file their Reply in Support is currently August 4, 2022.

Defendants assert that good cause exists for the requested 35-day extension because Plaintiff filed a 44-page brief plus an additional 25-page document in support, and it will take Defendants time to coordinate and prepare their response. Additionally, Defendants' counsel have pre-planned trial preparations, oral argument on appeal in other cases, briefing due in other cases, and travel scheduled over this response period.

This request is made in good faith and not for purposes of delay.

Dated this 25th day of July, 2022.

Respectfully submitted,

SNELL & WILMER L.L.P.

SCHWABE, WILLIAMSON & WYATT, P.C.

s/ Clifford S. Davidson (by permission)

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s/ Nika Aldrich

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